UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE
Suite 100
BOSTON, MASSACHUSETTS 02109-3912

September 30, 2011

Mr. Paul Hare
General Electric Company
319 Great Oaks Office Park
Albany, NY 12203

SDMS DocID 495066

Re: EPA comments to the December 2007, 100% OSD Design Report- including subsequent discussions, comments, modifications and/or additional submissions to the Design through July 2011.

Fletcher's Paint Works and Storage Facility Superfund Site (the "Site")

Dear Mr. Hare:

In June 2007, GE submitted 60% Designs for both the Low-Temperature Thermal Desorption (LTTD) remedy (as selected in the 1998 Record of Decision (ROD)) and an off-site disposal (OSD) alternative remedy. On November 1, 2007 the U.S. Environmental Protection Agency (EPA) issued comment on the 60% Preliminary Design for LTTD at the Site, submitted by Blasland, Bouck & Lee, Inc. (BBL) on behalf of the General Electric Company (GE). In that same letter, EPA offered comment on the 60% OSD Remedial Design alternative. The 60% LTTD Design was not subject to EPA approval or modification pursuant to Section XIV (EPA Review of Submissions) of the Order and the OSD remedy was not part of the July 2001 UAO.

In accordance with requirements set forth in a November 1, 2007 letter to GE, a Draft 100% Remedial Design Report for Off-site Treatment and/or Disposal which incorporated EPA's 60% Design comments and concerns was submitted on December 31, 2007. It was agreed at that time that the Constructability Review Report and the Bid Documents could be submitted at a later date.

EPA issued a Proposed Plan in June 2008 to change the source control component of the 1998 ROD from LTTD to OSD. In June 2009, EPA signed an amendment to the 1998 ROD replacing LTTD with off-site treatment and/or disposal and issued an amended UAO and SOW to GE in June of 2010. On September 30, 2010 EPA signed a second Explanation of Significant Difference (ESD) establishing new groundwater Interim Cleanup Levels for both arsenic and manganese.

In accordance with Section XIV of the UAO, as modified, (EPA Review of Submissions), EPA approves with modification, the collective Draft 100% Remedial Design. Since the original December 2007 Draft Design submission, there have been numerous other submissions related to the design including modifications, clarifications, addendums, as well as additional studies and/or decisions altering components of the initial Draft 100% Remedial Design. These modifications to the Draft 100% Remedial Design have continued throughout this review time period, with the most recent discussions during 2011 relating to changes in future use to include an asphalt cover and parking as well as a change in the location of the future southern railroad line at Mill Street. EPA's approval with modification therefore includes by reference all of the supplemental submissions, modifications and correspondence, including EPA and NHDES comments to those submissions over time, while not necessarily commenting on or specifically approving with modification each and every submission in this approval letter, unless otherwise noted.

The Draft 100% Remedial Design was submitted initially with the required design specifications per the UAO and SOW, however the final decisions for a few major components had not yet been resolved such as the duration of the temporary removal of the southern line and several access, and certain traffic and support issues. Meanwhile, the Town of Milford was reconsidering the future recreation use of the Elm Street Area surface which called into question the 60% Remedial Design engineered low permeability soil cap and utility design specifications (which EPA had incorporated into the 2009 OU1 ROD Amendment). This meant that new and on-going considerations and modifications for capping requirements had to be addressed before the remedial design could move toward approval.

Noted completions of outstanding issues since the original 100% Draft Remedial Design include the provision of alternative access for Keyes Park through a Town easement with the former Permattach property; provision of alternative access for several residential properties during construction; and the modification of the remedy from LTTD to OSD and the subsequent modification to the UAO and SOW.

Additional geo-physical investigations were also undertaken after the submission of the original design and modifications were made to address support and restoration plans along the river bank in a October 21, 2010 letter to the EPA.

Modifications to many of the original excavation-technical drawings were made in a January 19, 2011 submittal relating to changes in excavation limits as a result of a season low water table found in the July 20, 2010 gauging event. GE had noted that the impacts of these changes have not been reflected in a current schedule available for EPA review.

As a result of these changes since the submission of the original Draft 100% Remedial Design, EPA has tried to offer comment and modification to the Draft 100% Remedial Design as submitted, discussed, and/or modified. There remains however a few design considerations that have been more recent and comment and/or modifications cannot be addressed by EPA until GE submits a revised, Final 100% Remedial Design

incorporating these changes to the design and the modifications to all the specifications that result.

Specifically, General Electric submitted a support and excavation scenario which included the temporary removal of the southern rail line at Mill Street. GE has modified those plans over time to address railroad concerns and requirements noting however that a significant hurdle remained in the amount of time needed for the excavation and the removal of the southern line from service. More recently, the discussions regarding the relocation of the southern line by the railroad to a point west of the Mill Street Area cleanup has allowed for better clarity for the excavation design and may require modifications to the support and/or excavation plans, construction schedule, and railroad restoration plans, as necessary.

GE has made numerous submittals related to the design for the cover system and utility/tree corridors at the Elm Street Area throughout the remedial design process. During this time, the Town of Milford has reviewed and subsequently modified its long term goals for the future recreational use of the Elm Street Area. On September 13, 2010 the Town of Milford voted to remove consideration of the Elm Street Area as a future Memorial Park (the design specifications which had been incorporated by GE into the 60 % Remedial Design as well as by EPA in the Amended ROD in 2009). Rather the Town of Milford has assessed their needs and voted to replace the Memorial Park with additional parking for the Town. Several iterations of potential future parking area designs were then submitted and reviewed by GE, the Town, and EPA. In general, the need to meet capping requirements, the overall size of the property, parking and storm water requirements, as well as the significant slope of the final grade have been at the forefront of many of the discussions. In the spring of 2011, EPA requested that GE develop a design for a hybrid cap which would allow for a site restoration plan using the "larger cap" (as depicted in Figure 13-A of GE's February 28, 2007 letter to EPA) with some modifications for changes related to the removal of Memorial Park structures and utility needs. The hybrid cap would allow the current low permeability soil cap to remain (with modifications) over the majority of the Elm Street Area, while allowing an asphalt cover to be placed on the remaining lower concentrations in the northwestern portion of the property, thus allowing for additional future parking for the Town .

GE submitted a conceptual hybrid cap and following a discussion between EPA, GE, NHDES, and the Town of Milford in June 2011, this hybrid cover was found acceptable by all parties. GE's conceptual hybrid cap design has been included with this letter. This Approval with Modification letter requires GE to modify where needed, the Final 100% Remedial Design to incorporate the construction of the hybrid soil/asphalt cap and to modify the design details and specifications that result from this incorporation.

The Draft 100% Remedial Design, as modified through July 2011, is subject to EPA approval or modification pursuant to Section XIV (EPA Review of Submissions) of the Order. The Design included: the final design plans and specifications; drawings; a Contingency Plan which addresses the on-site construction workers and the local affected population in the event of an accident or emergency; a correlation of the design plans and

specifications; a Construction Quality Assurance Plan (CQAP); a detailed statement of how ARARs are met, and a statement of all assumptions and all drawings and specifications necessary to support the analysis of compliance with ARARS.

In accordance with the 2010 Second Modification of the UAO, GE shall, within sixty (60) days of receipt of EPA's approval or modification of the Draft 100% Remedial Design, submit to EPA the **Final 100% Remedial Design** for review and approval or modification by EPA, after reasonable opportunity for review and comment by the NHDES. EPA proposes that a meeting be held within sixty days from the date of this letter to discuss any outstanding issues, as well as these modifications and submission of the Final 100% Remedial Design. GE may at that time request an alternative schedule for the submission of the Final Design Report.

The Final 100% Remedial Design submission shall include submission of the Final 100% Remedial Design Report incorporating the comments and/or modifications on the Draft 100% report, as modified, and shall incorporate any further modifications proposed by the Respondent resulting from recommendations from the completion of the Constructability Review evaluating the implementation of the design and its components in relation to the Site. The Constructability Review Report and final bid documents, which were not required to be submitted along with the December 2007 report, shall therefore be submitted with the Final 100% Remedial Design. These final components of the 100% Remedial Design and any modifications that result from the submission of these components shall be subject to EPA approval or modification pursuant to Section XIV (EPA Review of Submissions) of the Order.

If you have any questions regarding this approval with comment/modification, please call me at (617) 918-1244 or Ruthann Sherman at 617 918-1886.

Sincerely,

Cheryl L Sprague

Cheryl L. Sprague
Remedial Project Manager
Office of Site Remediation and Restoration

CC: Michael Jasinski, EPA
Ruthann Sherman, EPA
Robin Mongeon, NHDES
Guy Scaife, Town of Milford
Tom Roy, Aries Engineering
Ellen Iorio, ACE NE
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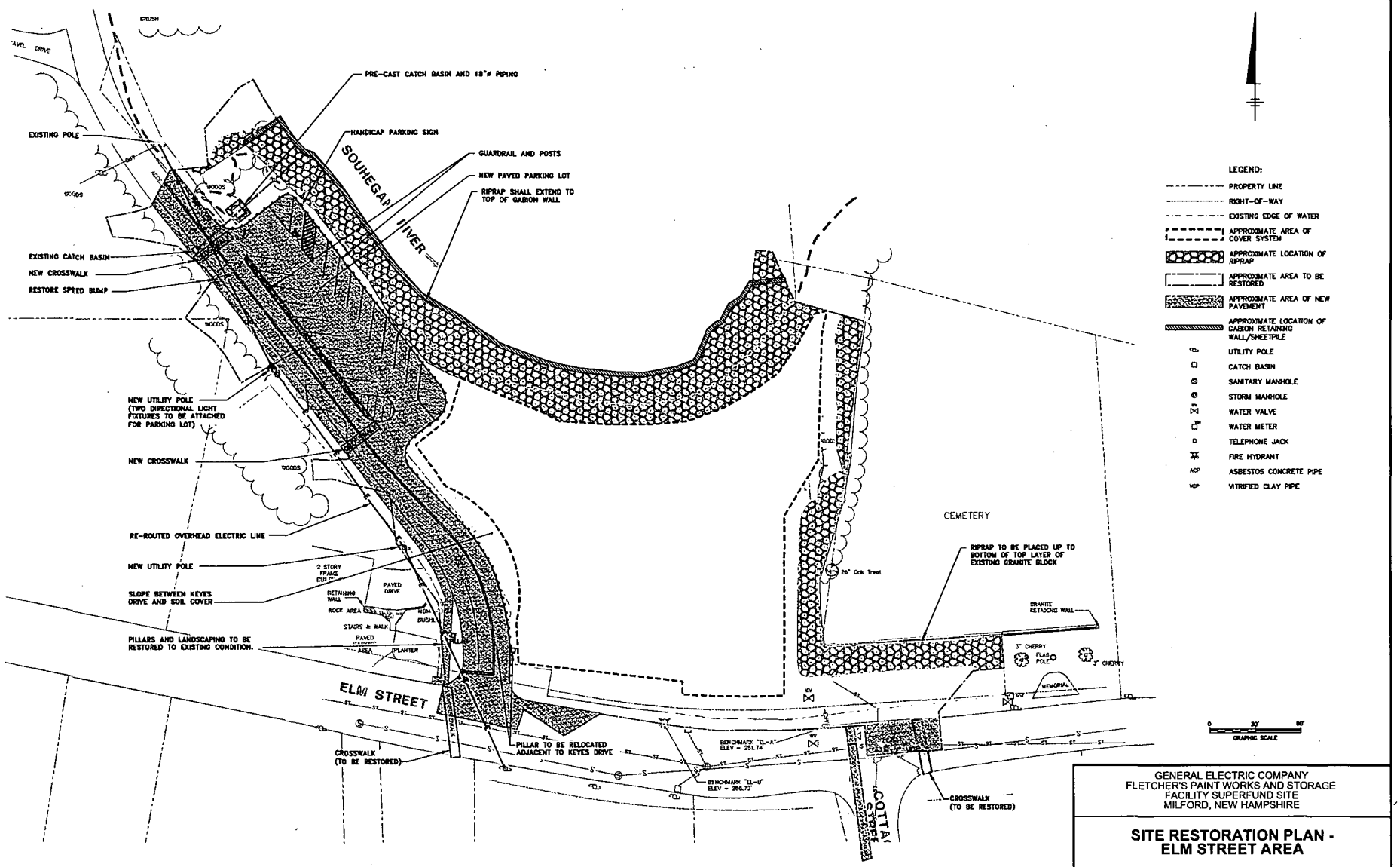
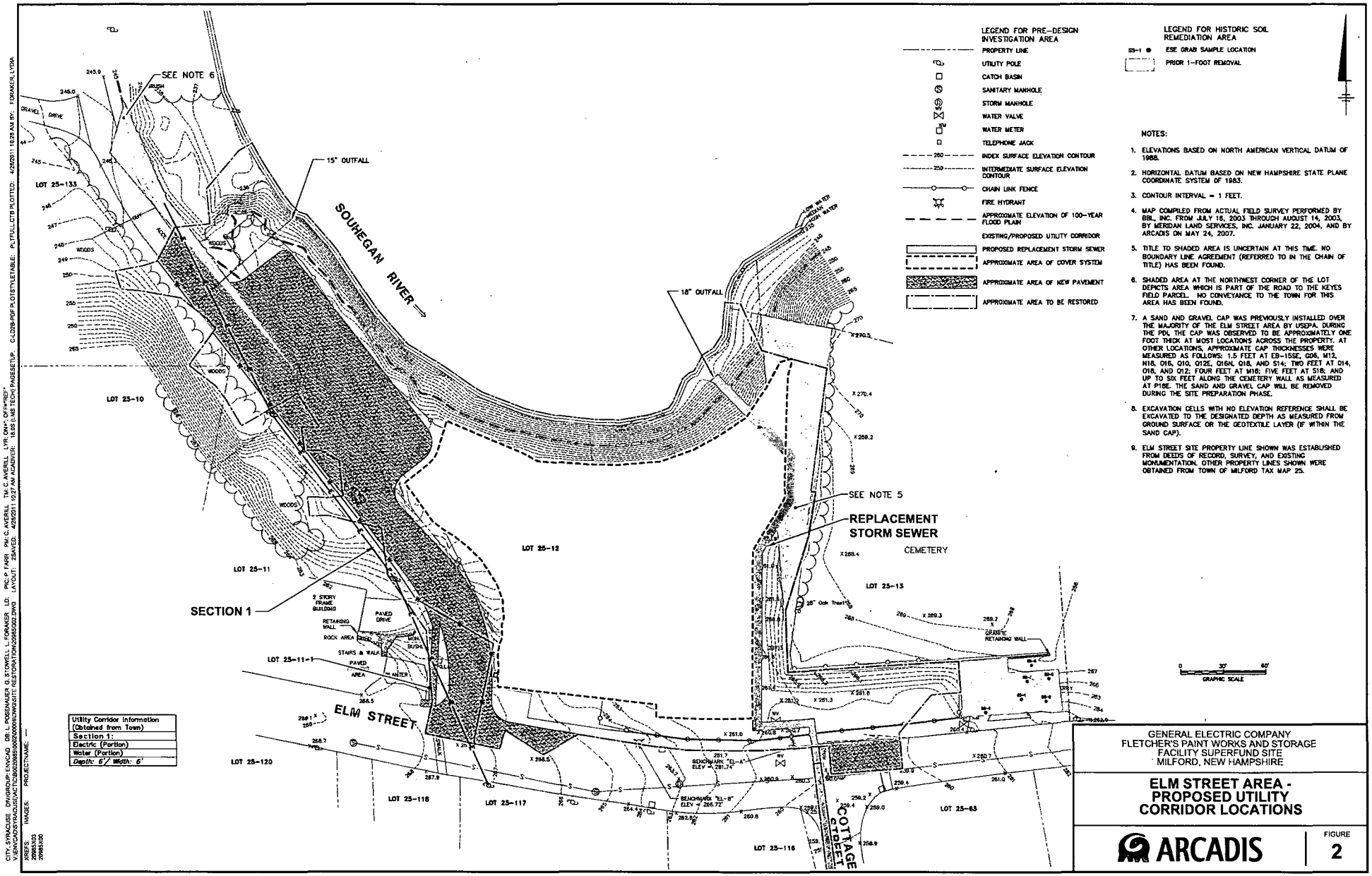


GENERAL ELECTRIC COMPANY
FLETCHER'S PAINT WORKS AND STORAGE
FACILITY SUPERFUND SITE
MILFORD, NEW HAMPSHIRE

SITE RESTORATION PLAN - ELM STREET AREA

ARCADIS

FIGURE 1



NOTES:

1. ELEVATIONS BASED ON NORTH AMERICAN VERTICAL DATUM OF 1988.
2. HORIZONTAL DATUM BASED ON NEW HAMPSHIRE STATE PLANE COORDINATE SYSTEM OF 1983.
3. CONTOUR INTERVAL = 1 FEET.
4. MAP COMPILED FROM ACTUAL FIELD SURVEY PERFORMED BY BBL, INC. FROM JULY 16, 2003 THROUGH AUGUST 14, 2003, BY MERIDAN LAND SERVICES, INC. JANUARY 22, 2004, AND BY ARCADIS ON MAY 24, 2007.
5. TITLE TO SHADED AREA IS UNCERTAIN AT THIS TIME. NO BOUNDARY LINE AGREEMENT (REFERRED TO IN THE CHAIN OF TITLE) HAS BEEN FOUND.
6. SHADED AREA AT THE NORTHWEST CORNER OF THE LOT DEPICTS AREA WHICH IS PART OF THE ROAD TO THE KEYES FIELD PARCEL. NO CONVEYANCE TO THE TOWN FOR THIS AREA HAS BEEN FOUND.
7. A SAND AND GRAVEL CAP WAS PREVIOUSLY INSTALLED OVER THE MAJORITY OF THE ELM STREET AREA BY USEPA. DURING THE PDI, THE CAP WAS OBSERVED TO BE APPROXIMATELY ONE FOOT THICK AT MOST LOCATIONS ACROSS THE PROPERTY. AT OTHER LOCATIONS, APPROXIMATE CAP THICKNESSES WERE MEASURED AS FOLLOWS: 1.5 FEET AT EB-15SE, G06, M12, N18, O16, O10, O12E, O16N, O18, AND S14; TWO FEET AT D14, O18, AND O12; FOUR FEET AT M16; FIVE FEET AT S16; AND UP TO SIX FEET ALONG THE CEMETERY WALL AS MEASURED AT P18E. THE SAND AND GRAVEL CAP WILL BE REMOVED DURING THE SITE PREPARATION PHASE.
8. EXCAVATION CELLS WITH NO ELEVATION REFERENCE SHALL BE EXCAVATED TO THE DESIGNATED DEPTH AS MEASURED FROM GROUND SURFACE OR THE GEOTEXTILE LAYER (IF WITHIN THE SAND CAP).
9. ELM STREET SITE PROPERTY LINE SHOWN WAS ESTABLISHED FROM DEEDS OF RECORD, SURVEY, AND EXISTING MONUMENTATION. OTHER PROPERTY LINES SHOWN WERE OBTAINED FROM TOWN OF MILFORD TAX MAP 25.

GENERAL ELECTRIC COMPANY
FLETCHER'S PAINT WORKS AND STORAGE
FACILITY SUPERFUND SITE
MILFORD, NEW HAMPSHIRE

ELM STREET AREA - PROPOSED UTILITY CORRIDOR LOCATIONS

ARCADIS

FIGURE 2

EPA/NHDES Comment to the Draft 2007 100% OSD Remedial Design, as modified and/or supplemented through July 2011.

1. Introduction and General Comment: The Introduction (and remainder of the report) shall be modified to include and/or reflect the changes contained in the 2009 Amended Record of Decision and 2010 Explanation of Significant Differences as well as the 2010 modification to the 2001UAO.

2. Introduction, Page 2, top paragraph: The Town of Milford submits comments on the Draft Remedial Designs to facilitate discussion, consideration from the EPA and response from General Electric. This has been the on-going procedure through out the remedial design. EPA reviews and considers the Towns comments prior to finalizing our own comments and GE has responded to the Town's comments throughout this design period.

3. Introduction, Section 1.2: Please include updated information relative to the Final Pre-Remedial Design Report.

4. Section 1.4 – Site History and Description: please insert the following language into the first paragraph: (taken from 2009 AROD) "Spills, leaks, manufacturing operations, and dust suppression activities led to the current contamination of the soils at the Site. As a result, PCBs and other contaminants were released to the environment and are found at concentrations in Site soils, sediments, and groundwater at levels that pose an unacceptable risk to human health and the environment. Additional details on the Site history and the characterization of the contamination at the Site can be found in the 1998 ROD and the 2009 Pre-Design Investigation Report."

5. Section 1.4.4 Summary of Site Characteristics – page 9 – please update to include findings of DNAPL and report DNAPL concentrations and summarize current findings in groundwater.

6. Section 1.5.1 EPA's Description of the ROD Remedy: Please update per the 2009 AROD.

7. Section 1.5.1 Soil SCLs: EPA does not believe an ESD would be required to address GE's concerns that the arsenic and PAH's in surface soils would need to be addressed beyond areas where PCBs exceed 1 mg/kg PCB. To highlight EPA's continued position on this I have included language below from both the 2009 AROD and AROD Responsiveness Summary summarizing the respective remedy components:

2009 AROD: Elm Street:

- Excavation of surface soils at the Elm Street area to a depth of 1 foot, wherever PCB concentrations are greater than 1 mg/kg PCB.

2009 AROD Mill Street

- Excavation of surface soils (0 to 1 foot) at the Mill Street area to a depth of 1 foot, wherever PCB concentrations are greater than 1 mg/kg PCB.

Responsiveness Summary 2009 AROD, in response to GE comment:
"This ROD amendment does not address changes to any cleanup level. Cleanup levels were set in the 1998 ROD, and amended in the 2001 ESD to account for practical quantitation limits for the PAHs and background concentrations of arsenic in NH soils.

EPA does not expect to change these cleanup level requirements, as the 1998 ROD established that surface soils would be excavated to a depth of 1 foot, wherever PCB concentrations are greater than 1 mg/kg PCB. EPA acknowledges it has approved remedial designs that allow for the cleanup of arsenic and PAHs only where PCBs are in excess of its cleanup level."

7. Section 1.5.2.2 ICL's for Groundwater: Please revise this section to match the 2010 ESD. Also include language describing GE's estimate of the time to reach groundwater ICLs given the current understanding of groundwater contamination in the overburden and bedrock. Include details from the river bottom drilling event. Please discuss the potential for groundwater to sediment and surface water migration which presents an issue with establishing the boundaries of the GMZ and is a concern for future OU2 activities.

8. Section 1.6: Bottom of page 19: Per EPA's approval with modification of this Draft 100% Remedial Design, these remaining documents will require submission as noted in the cover letter and as allowed in the modified UAO/SOW or as otherwise agreed, with the exception of mylar drawings which EPA previously agreed was no longer required.

9. Section 1.7 Constructability Report: GE indicates that URS had completed most of the constructability review on the Draft Final Design Report. GE shall complete this review and incorporate the findings and recommendations of this review in the Final 100% Remedial Design Report. The final Constructability Review shall be submitted along with the Final 100% Remedial Design.

10. Section 2.6 Development of limits of Excavation: Please update, as needed, any text, table or design relative to any modifications to the design which also modifies limits of excavation and associated volumes, etc. relative to changes and modifications of the remedial design.

11. Section 2.6 Development of limits of Excavation: Page 31, Limits of Excavation cell DD: The design notes that a portion of the 1 foot excavation of cell DD includes the removal of the asphalt surface swale. Please provide more detail as to how deep this swale would be excavated, whether the drainage piping would be removed (which connected that drainage swale to the storm sewer line under the Elm Street property), and why the two locations near the swale ESSR18E and ESSR-20N will not be addressed by this activity. Since this swale channeled water away from the stone wall – albeit from the former building-will any structural issues need to be considered in this area to ensure that the stone wall and the nearby graves are not impacted, eroded or such in the future with the change in drainage and potential erosion or freeze thaw issues?

12. Section 2.6 Development of limits of Excavation: Page 31, Limits of Excavation cells CC and DD: Cells DD and CC either cross into or border the cemetery on Elm Street. GE has indicated that for the most part, these cells will stop at what is considered the current cemetery borders. Has GE considered and addressed any Health and Safety, Town requirements or other contingency matters for dealing with any accidental exposed graves or other grave materials during construction. Previous work on Elm Street indicates that not all records kept have been accurate as to burial locations and the Town history notes that the cemetery allowed "pauper graves" at night in unmarked locations.

13. Section 2.6 Development of limits of Excavation: Page 32, Mill Street MSSB-C01: Please include the depths of the two samples at this location 4.4 mg/kg found at 11-13 feet and 9.5 mg/kg found at 23-25 feet.

14. Section 2.6 Development of limits of Excavation: Page 32, Mill Street 30 samples from 19 locations identified in Table 10 of 2007 Design report, which GE has requested to exclude from excavation.

According to GE's March 30, 2007 letter on Mill Street Excavation limits, the excavation limits as proposed do not address roughly 40 soil samples collected during pre-design in the Mill Street area with low levels of PCB contamination, but which all exceed the 1 ppm PCB SCL. GE notes that to excavate to these sample locations, which include exceedances of 1 ppm at depths and locations and in areas surrounded by soils with less than 1 ppm, would require an additional 3,600 cubic yards of soil to be excavated at the Mill Street Area. This volume represents would represent a 40% volume increase in the amount of soil requiring removal at Mill Street. These additional excavations of soil could decrease the short term effectiveness (worker safety issues, local impact, etc) and would increase the cost without changing or increasing the long term protectiveness or affecting the overall protectiveness of the remedy. These soil samples were collected at depth and therefore there is no direct exposure should these soils remain in the surface and should not affect the overall goal of attaining the MCL in groundwater of 0.5 ug/l.

To excavate to these sample locations would require the excavation of soil which contains PCBs less than 1 ppm. BBL/Arcadis estimated that the current excavation scenario (not including this material) removes 99.9% of the mass of PCBs at the Mill Street Area and the additional 3,600 cubic yards would only remove 0.1% of the PCB

mass at the site. The subsurface soils are subject to a 1 ppm PCB cleanup level to protect groundwater, which must achieve an MCL of 0.5 ug/l PCB.

Paragraph 92 and 93 of the Unilateral Administrative Order (2001) require that the Work performed by Respondent shall, at a minimum, achieve the Performance Standards specified in the Record of Decision, ESD and in Section IV (Performance Standards) of the Statement of Work and (93) Notwithstanding any action by EPA, Respondent remains fully responsible for achievement of the Performance Standards in the ROD, ESD and Statement of Work. Nothing in the Order, or in EPA's approval of the Statement of Work, or in the Remedial Design or Remedial Action Work Plans, or approval of any other submission, shall be deemed to constitute a warranty or representation of any kind by EPA that full performance of the Remedial Design or Remedial Action will achieve the Performance Standards set forth in the ROD, ESD and in Section IV (Performance Standards) of the Statement of Work. Respondent's compliance with such approved documents does not foreclose EPA from seeking additional Work to achieve the applicable performance standards.

Cleanup levels at CERCLA sites must meet two criteria: (a) cleanups must comply with all ARARs; and (2) cleanups must be protective of human health and the environment. With respect to ARARs, the NCP sets for an expectation that usable aquifers will be restored where practicable, and that maximum contaminant level (MCLs) established under the Safe Drinking Water Act, shall be attained. The ROD, as Amended includes three measures of protection: Enforcement of an ARAR (MCL); mass removal of PCBs to the SCL to protect human health exposure and to protect groundwater from potential leaching to facilitate attainment of the ARAR and finally, the use of institutional controls to restrict groundwater use until the ARAR is attained. The enforceable standard (ARAR) and the remediation cleanup goal in the ROD to measure protectiveness is the MCL of 0.5 ug/l PCB in groundwater. The remedy as proposed has no additional post closure care requirements because the hazardous substances in soils have been removed to sufficiently low levels that no further action is deemed necessary to be protective and engineering controls are not required. Future groundwater route of exposure is protected by addressing the soils to prevent leaching above the MCL and through groundwater use restrictions until the current concentrations in groundwater achieve the MCL.

EPA can accept GE's proposal to not excavate the significant, additional volume of soil to remove these specific, individual PCB soil samples, which are mostly just over the cleanup level of 1 ppm, and either in areas designated for SPTC wall installations or in areas removed from other elevated concentrations. In doing so, EPA is not changing the cleanup level which must be achieved, but rather indicating that the Agency has considered whether in doing so, the remedy overall is likely to achieve ARARs and maintain the ROD/AROD specified level of protectiveness and permanence over time. As noted above, the current excavation scenario will remove 99.9% of the mass of PCBs in soils at the Mill Street Area. GE has not indicated otherwise, nor does EPA believe that this residual contamination in isolated areas, just above cleanup levels will alter or affect the ability of the remedy to be protective of groundwater and will therefore provide long term protectiveness and permanence of the soil remedy.

The exception to this request is the locations and concentrations proposed by GE (MSSB B-13, B-17, B-13E and C18N) to remain at the completion of the remedy which are all situated within the surface (top one foot). For these locations, the remedy would not be protective for human health given the potential for unrestricted access, potential exposure scenarios and future recreational use of the adjacent properties. GE is therefore required to excavate these surface soils to remove all PCB concentrations greater than 1 ppm in the top foot per the ROD/AROD.

The remainder of the locations has been reviewed by EPA and are situated below the surface (one foot) and therefore will reduce protectiveness for human health given the future recreational use of the properties (direct exposure through dermal contact/ingestion of soils). While EPA has reviewed and could discuss with GE if requested each proposed location, EPA"s response in this approval letter considered whether the acceptance of this proposal (collectively, rather than as individual sample locations) will be protective of groundwater at the completion of the remedy. GE must meet the MCL for PCBs in groundwater at the completion of the remedy (or unless a TI waiver is granted in the future). GE has proposed that the removal of 99.9% of the PCB mass in soils at the Mill Street Area will meet this goal by preventing the leaching of PCBs from the residual soils into groundwater, above the MCL in accordance with the ROD/AROD.

EPA's assessment of this would not be complete without also acknowledging that the ability to measure the contribution to groundwater from the leaching of these residual PCBs into groundwater above the MCL in the future can only be assumed given the presence of DNAPL within the bedrock and the consistently elevated levels of PCBs in groundwater that currently exists. GE's estimated timeframes presented in the Pre-Design Report for current groundwater concentrations to meet the PCB MCL in the Mill Street Area is approximately 20 years for the overburden and over 100 years for the bedrock aquifer.

15. Section3.2, page 39: Please clarify what is meant by "acceptable review of all required pre-mobilization submittals" in the last paragraph.

16. Section 3.3.1 Elm Street Area, page 41: I believe a citizen asked if the Elm Street work could be done at night to decrease the traffic burden thinking that during the day – the traffic lane would be open. The Town/public needs to clearly understand that even if the work was performed at night – based on GE's section 3.3.1 – the lane itself would not be available until the excavation and backfilling work was complete.

17. Section 3.3.1: Update this last section to note that the details of the Keyes Field Alterative Access arrangements and Mill Street access arrangements.

18. Section 3.5.1 Exclusion Zone and Section 3.5.2 Contaminant Reduction Zone: It is unclear how the transition from EZ to CRZ will occur within the work areas given the potential for personnel and equipment decon to be on opposite sides of the work area, and the suggested movement of donning/decon with activities etc. Consider using the Keyes

Field staging area just inside the gated area, and where the personnel protection equipment and safety equipment will already be stored, for the donning of PPE (as noted for this support zone in Section 3.5.3), and an area just within the working limit for the conducting of decon (with mobility for the performance of work in that area). The current schedule/mobility issues offer concerns since the EZ is the working area limits – then one has to enter the EZ (physically enter the Elm Street property) to get to the CRZ to don PPE.

19. Section 3.6 Utilities: Storm sewer trenching across Elm Street: This activity (excavation, trench box, backfill) was not detailed to the public at the time of the proposed plan as another time period of road disruption/closure/detour. Since road disruption is of major importance to the Town of Milford it would be helpful to understand details of this activity such as: Will this require total road closure of Elm Street? How long will this activity take to accomplish through backfill? Is this an activity that can be accomplished at night to reduce the impact on the local traffic?

20. Section 4.5.2 Influent Characteristics of Temporary Water treatment System: Will the influent characteristics be modified (potentially) to also reflect the groundwater concentrations collected during the semi-quarterly monitoring?

21. Section 9.0: remedy Implementation Construction Cost Estimate: The Final Design Report shall include a construction cost estimate for EPA review.

22. Section 9.0 Schedule: EPA would like to discuss the project construction schedule at the meeting EPA requested in its cover letter, to be held within 60 days from the date of the approval letter.

Drawing G-4:
Note 6: Add a note to highlight the protection of the oak tree to be saved along the western edge of the cemetery.
Note 7: Consider including language which may allow consideration for support areas/materials to remain, be reused elsewhere as appropriate or be reused by the Town following cleanup, per our June 13, 2011 conference call.
Note 13: Prior to Work within the Elm Street right-of-way the Town, Police and Fire should be notified and traffic control measures should be discussed.

Drawing G-5: Site preparation plan – Keyes Park. The area by the trailers and length of Keyes drive prior to work or staging areas is accessible to children while visiting the park. (Fencing is along both sides of the road but not cutting off access) Consider fencing along the northwestern portion of the work area (connecting the fence in existence on the western side of the road to the edge of the river-along the proposed field trailer area) to prevent children from accessing this area during construction and if not, what form of security/safety/flaggers will be there be there to prevent children from entering these areas when cars/trucks are moving about?

Drawings G-7 and G-8: Phase 1 and 2: Please note how the trucks will enter/exit the Work Zone and approach the excavated vehicle stockpile, should one be constructed. Section 4.7.6 notes that the trucks would be then be routed through an equipment decontamination area. Phase 1: How would trucks exit the Site having gone through this fairly narrow decon area. The truck routes have them going back west along Elm Street which would mean they would need to turn around at the Elm Cottage intersection or drive up cottage, down Mill, and out West Street to get back to Elm Street. Phase 2 – Drawing G-8 has potential equipment decon with personnel decon and again within a narrow area for truck movement.

Drawing G-15, and Detail 2 of Drawing G-28: Drawing G-5 Note 2 indicates the mixing of excavated dry and wet soils to augment dewatering. Detail 2 in Drawing G-28 indicates that the mixing/dewatering occurs on a liner covered with twelve inches of crushed stone or gravel. How will the mixing occur without incorporating those bottom drainage materials?

Drawing G-18: This drawing will change for the new final cover system and reuse of the site. Please indicate the new utility plans and indicate if the water line noted in G-12 (Contractor shall temporarily support or relocate water main as necessary to excavate area) will be placed within the "new" utility corridor if relocated during excavation. The drawing notes that a sprinkler water line is capped off. Will this water line be removed (if left in place, it would be inaccessible under the 40 inch cover)? If not entirely removed would you cap this water line at the edge of the sidewalk during site preparations?

Drawings G-22, 24: Mill Street Site Restoration: Has GE determine (in consultation with the Railroad Company), the final grade or any structural support changes resulting from the removal and relocation of the Southern Line? If so - please note these changes. If not, please note that the southern line will not be replaced during restoration and note any remaining issues or considerations for remedial action restoration.

Verification Sampling Plan

The Final 100% Remedial Design Verification Sampling Plan should address and incorporate any modifications to this plan resulting from any changes to excavation and/or over excavation, changes in utility, tree corridors, etc resulting from the incorporation of the hybrid cap into the Final Design. These changes should be incorporated subject to the four conditions noted on page 5 of the VSP in the Draft 100% Remedial Design.

Two other areas which may require modification in the Final design is GE's proposal for no confirmation sampling near the southern railroad line and cell V should the removal and relocation of the southern line alter in any way this proposal.

4.2.3: Mill Street Area: The Mill Street verification plan shall follow the Elm Street plan and the language in the top bullet on page 25 shall be modified to state "...If the mean is

greater than 1 mg/kg , then additional analysis, sampling and or remedial action is necessary." The second bullet on page 25 from the top shall be modified to match the Elm Street plan and shall state "If one or more confirmation sample results are greater than 2 mg/kg total PCBs then additional analysis, sampling and/or remedial action is necessary."

Appendix C: Technical Specs:

MP02208- Restoration of Surfaces: MP -2208-05: 3.07 Maintenance: The text does not specify any need for or reference to a maintenance plan or schedule for the one year of maintenance requirement. Will such a plan be required for inspections, etc?

Section 13602 – Temporary Water Treatment System:
NHDES Comment: The MTBE, TBA and TAME discharge limits in the attached table should be revised to reflect current New Hampshire Ambient Groundwater Quality Standards of 13, 40 and 140 ug/L respectively.

Because there have been gasoline related releases in the vicinity of the site it is important to not only monitor for TBA and TAME, but to set discharge limits as well at NH Ambient Groundwater Quality Standards. The value that was listed in the draft for MTBE is an old out-dated standard.

Appendix E: Truck Route and Traffic Analysis Report- Revised October 30, 2008

EPA has no comment on the revised truck route and traffic analysis plan except for stressing continued communication on any revisions to this plan with the Town concerning the use of the former Police Station property given the potential sale of this land and to stress the need for communication of all future schedule and traffic details to the public during construction (including the alternative access to the Keyes Field –as detailed in GE's October 14, 2008 letter). EPA suggests that GE request that the Town post the traffic activities on the Town's web site, just as the Town itself does when performing its own road work, so as to reach the public with the latest traffic issues during construction.

Appendix J: Contingency Plan – Revised April 15, 2011

Section 1.2: Include the second ESD, Amended ROD and second modification to the UAO to this section.

Section 2.1: Define SC.

Section 3.2: Fencing/gates are also located (or will be added) in the Keyes Drive area to secure the clean operations and general site access.

Table J-6: The number for the National Response Center should be listed: 1800-424-8802. The NRC is the sole federal contact for reporting oil and chemical spills. The NRC operates 24 hours per day, 7 days a week, and 365 days per year.

Figure J-2A: This Figure indicates that one of the primary personnel emergency gates is at the back of the site along the steep bank (before crossing the ditch to the cemetery) and in the area of significant remedial work (deep excavations, tank pulls, support installation, materials staging, etc). Please consider whether another personnel gate (for emergency exit only) near the Korean War area would be easier or safer (or as an alternative during certain remedial construction phases of support installation and deep cell excavation). Also is there a location designated for any on-site vehicles exiting in an emergency. It is also confusing that the designated decon/drum storage area and emergency response center appears to be located where the Stage 1 clean backfill staging area has also been designated.

Dewatering Plan: Phase 1 Drawdown is targeted at 3 feet below the excavation depths. Deep wells are 8 in wells, screened just above and/or into shallow bedrock. Deep wells collectively are to manage 150 gpm flux into the excavation.

Will the 150 gpm max rate of the temporary treatment system cause erosion within the drainage ditch at discharge, will the discharge be channeled further down the ditch into the new storm sewer section and if not what protective measures will be sued to prevent erosion issues in the open portions of the ditch?

Mill Street Relocation Plan:

It appears that all issues with the Mill Street realignment are resolved at this point.

The utility poles are shown at their existing locations, but will be relocated so not within the new street alignment. There is a note on Drawing T-7 to that effect, but the new locations are not shown, and work needs to coordinate with the utility. It is our understanding that these poles will be located 5 feet off the new road, subject to not being on the railroad property (unless the railroad grants approval to the town and/or utility for that on a long-term basis).

EPA understands that GE's design includes that the width of the new road is to be the same as the existing road, excluding the roughly 7-10 foot apron that was installed in the mid 1990s at the direction of EPA. While GE states that this apron was requested by the EPA for reasons unrelated to traffic flow, EPA disagrees in that it was actually traffic and terrain issues which subsequently let to the erosion of the edges of the Mill Street roadway, causing the soil cover and liner of the temporary cap to become damaged and allowed PCB contaminated soils to be exposed. Please indicate whether Milford has a current required width for road re-paving activities that must be complied with, and 1) if there is, will this requirement be met at the completion of the remedial action and/or 2) if not, how will the edging of the pavement on the new Mill Street address surface runoff. and control erosion.

Drawing T-7 should have shown the actual profile line along the road alignment. It will be included in the final design drawing. The longitudinal profile that is shown by the small circles on Drawing T-7 (if you connect the dots manually) follows the existing grade, and therefore should be quite similar to the current road (as depicted in the cross sections on subsequent T-series drawings).

Corp of Engineer COMMENTS (Dec 2007 100% Design Report)

Appendix B: Technical Drawings -Drawing S-1

Legend: last legend solid line: Soil removal cell limits based on figure 11 by ARCADIS BBL dated December 2007. Provide a reference to a document that is part of Final 100% report.

Appendix B: Technical Drawings - Drawing S-2

Legend:

last legend solid line: Soil removal cell limits based on figure 11 by ARCADIS BBL dated December 2007. Provide a reference to a document that is part of Final 100% Report.

a) Note 1 : Identify drawing nos. by ARCADIS that are included in the Final 100% report.
b) The construction surcharge of 300 PSF as stated in the note is not same as calculations. Calculations consider a construction surcharge of 0.15 ksf which is less.

Appendix B: Technical -Drawings -Drawing S-3

a) Cell V & Cell Q Bracing Layouts: Detail 3/S-7 shown at two locations do not match with detail 3/S-3 shown on drawing S-7.

Appendix B: Technical Drawings -Drawings S-4, S-5, S-6

Soldier Pile HP 14X 102 are spaced at 6 feet. However, design calculations consider 5 feet spacing. Show spacing same as design calculations. Show construction surcharge value where surcharge is shown.

Appendix B: Technical Drawings -Drawing S-7

Section 3/S-3: See comment for drawing S-3

Appendix B: Technical Drawings -Drawing S-13

a) Section A-A/S-9: The bracing orientation does not match as shown on drawing S-10.

Appendix C: Technical Specifications - Specification Section 02160 -Page 22 of 30

Part 3 – Execution, para. 3.04 Steel sheet Piling: Include requirements for sheet piles about submittals, delivery, storage and handling, material tests, inspection and verification, pile driving equipment, placing and driving, cutting off and splicing, inspection of driven piling, pulling and redriving.

Appendix C: Technical Specifications –Specification Section 02400 - Page 23 of 30

Part 1 – General, para.1.03 Definitions and Reference standards, sub-para. A, B, C, D, E, F & G: Identify particular referred standard specification using numbers, year of revision etc. and not just providing standard organization names.

Appendix C - Technical Specifications: Specification Section 02160, Page 22 of 30:

Part 3 – Execution, para. 3.04 Steel sheet Piling: Include requirements for sheet piles about submittals, delivery, storage and handling, material tests, inspection and verification, pile driving equipment, placing and driving, cutting off and splicing, inspection of driven piling, pulling and redriving.

Appendix F: Design Calculations -Elm Street Calculations

a) Provide a reference for the 25-year storm data and corresponding loading considered in the design.
b) Pages 52 and 53 (numbered 58 incorrectly) are not legible. Provide a 11X17 copy that is legible.

Appendix F

Additional survey must be conducted on the bank into the river before a final design can be developed for the protection of the river bank, including the toe and the end protection. Typical sections and sections along the baseline, showing existing ground location, slopes and proposed construction should be included.

Appendix F

The riprap layer thickness and stone size should be checked for vandalism susceptibility (see page 3-6 of EM 1110-2-1601, which states that need d50=80 lbs for urban areas).

Appendix F: Design Calculations - Mill Street Calculations

a) Provide a reference for the 25-year storm data and corresponding loading considered in the design.
b) Pages 59 and 60 are not legible. Provide a 11X17 copy that is legible.

Drawing: G-6

Does the containment section apply to the entire water treatment staging area? If so where will the gravel access ramp be provided?

Drawing: G-20

The notes indicate the storm sewer to be constructed and sized according to Milford Requirements; Requirements are not noted in the appendices. It would seem to be simpler to specify the size, materials and specs. in accordance with town requirements, rather than provide the entire requirements.

Drawing G-20

Where will storm flows go while the new outfall is being constructed?

General Comment

Please provide tabs and titles for each appendix and other substantial items in the submittal.

Specification Section 02201 & 02203

Both of these sections make use of the term "suitable fill." This term should be defined in the definitions section of each specification section.

Spec General Comment

A separate section for "Stone Protection" should be included which describes the riprap material and construction requirements. An example of what is required can be found in the USACE guide specifications at http://www.wbdg.org/ccb/DOD/UFGS/UFGS%2035%2031%2019.pdf.

Spec General Comment

The 100% Final Design shall incorporate the October 21, 2010 modifications

Drawing G-27, Gabion Gravity Wall:

The non-woven geotextile should be extended under the gabion wall, to act as a separation barrier against bedding layer intrusion and subsequent settlement. Additionally, demonstrate how the gabion baskets will be protected against rupture when subjected to ice and debris attack during higher flows.

Specifications, MP-02201-6, 3.06 (D) (1&2)
Reference is made to both ASTM D 698 and ASTM D 1557.
Which standard will be used?

Town's Comments to the 2007 100% OSD design:

The Town of Milford (Town) is concerned that the 100% design does not adequately consider the Town's technical ordinances regarding Town infrastructure, water supply, and sewer design.

The 100% design *Volume II-Appendices* included an edited version of the Town's ordinances in *Division 17-Specifications Provided By Others*. The edited Town ordinances included administrative sections which the 100% design deleted (and the Town understands is consistent with Superfund site work) and technical sections which were also removed (which the Town does not agree is appropriate). While some technical sections may not apply to the proposed work, the removal of these sections does not present a potential problem unless the design is changed or modified to include these technical elements. If that is the case, then the Town would like the removed technical ordinances included in any design modification. The deleted ordinances that should be considered if the design is modified include the following:

1. *Infrastructure Design, Part B Roadway and Trenching Construction*, B-28 and B-29, *Roadway Stabilization Fabric*
2. *Infrastructure Design Part B Roadway and Trenching Construction* B-41 and B-42, *Steel Beam Guardrail*
3. *Infrastructure Design Part B Roadway and Trenching Construction* B-50 through B-53, *Trees and Shrubs*
4. *Infrastructure Design Part C Blasting and Explosives*
5. *Infrastructure Design Part D Fire Cistern Specifications*
6. *Water and Sewer Part B General Construction Standards, General Pump Station Technical Requirements*
7. *Water and Sewer Part C Sewer System, Sewer Pump Station technical Requirements*
8. *Water and Sewer Part D Water System, Water Cross-Connection Control Program, Water Construction Design Details*

There are other Town technical requirements that were removed that appear to apply to the 100% design. These applicable requirements include the following deleted Town ordinances:

1. *Infrastructure Design Part B Roadway and Trenching Construction*, B-25, fertilizer and lime application
2. *Infrastructure Design Part B Roadway and Trenching Construction*, B-43, fertilizer and lime materials
3. *Infrastructure Design Part B Roadway and Trenching Construction*, B-44, loam placement
4. *Infrastructure Design Part B Roadway and Trenching Construction*, B -45, fertilizer and lime application
5. *Infrastructure Design Part B Roadway and Trenching Construction*, B-46, fertilizer and lime materials, delivery and storage

6. *Infrastructure Design Part B Roadway and Trenching Construction*, B-48 and B-49, fertilizer spreading and application rates
7. *Water and Sewer Part B General Construction Standards*, B-15 and B-17, fertilizer and lime materials, delivery and storage
8. *Water and Sewer Part D Water System, Water Cross-Connection Control Program, Water Construction Design Details, Fire Hydrant Assembly Detail*

The Town has indicated their willingness to work with GE on making reasonable appropriate revisions to the Town's technical ordinances once the Town's technical requirements are formally included in the 100% design.

Fw: Trichloroethylene (TCE) assessment available from IRIS

Mike Jasinski to: Anna Krasko, Byron Mah, Cheryl Sprague, Darryl Luce, Dave Newton, Jim Brown, Ron Jennings, Gerardo Millan-Ramos, Richard Hull — 09/29/2011 09:22 AM

Sorry if this is a duplication of other emails.

Michael Jasinski, EPA Region I - New England
Chief, NH/RI Superfund Section
(617) 918-1352
----- Forwarded by Mike Jasinski/R1/USEPA/US on 09/29/2011 09:19 AM -----

From:	Meghan Cassidy/R1/USEPA/US
To:	Stan Chin/R1/USEPA/US@EPA, Larry Brill/R1/USEPA/US@EPA, Mary Sanderson/R1/USEPA/US@EPA, Arthur Johnson/R1/USEPA/US@EPA, Bob Cianciarulo/R1/USEPA/US@EPA, Mike Jasinski/R1/USEPA/US@EPA, James Chow/R1/USEPA/US@EPA, Bryan Olson/R1/USEPA/US@EPA, Dave Deegan/R1/USEPA/US@EPA
Cc:	Chau Vu/R1/USEPA/US@EPA, Margaret McDonough/R1/USEPA/US@EPA
Date:	09/28/2011 04:51 PM
Subject:	Fw: Trichloroethylene (TCE) assessment available from IRIS

Slight correction to info provided in original message.

With new tox values, GW concentration estimate = 1.0 ug/L at target risk of 1E-6 so MCL of 5 ug/L will result in cancer risk of 5x1E-6.

Indoor air concentration estimate = 0.4 ug/m3 at target risk of 1E-6 so this would be the new residential IA screening level for VI.
slight correction on info below

Meghan Cassidy, Chief
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----- Forwarded by Meghan Cassidy/R1/USEPA/US on 09/28/2011 04:47 PM -----

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Cc:	Margaret McDonough/R1/USEPA/US@EPA, Chau Vu/R1/USEPA/US@EPA
Date:	09/28/2011 03:58 PM
Subject:	Fw: Trichloroethylene (TCE) assessment available from IRIS

With no fanfare the new TCE assessment was posted to IRIS. Thanks to Margaret for assuming this might be the way they decided to "release" this long-awaited toxicity information.

We may receive some notification from the press office about a press release and possible desk

statement. No details. Dave Deegan had a heads up on this so as always press calls should be referred to him.

The following is a summary of the info provided from Chau Vu for your information.

Recommended toxicity values for use -

CSF = 5E-2 (mg/kg-day)-1 for all 3 cancers
IUR = 4E-6 (ug/m3)-1
RfD = 5E-4 mg/kg-day
RfC = 2 ug/m3 (or 4E-4 ppm)

With these tox values, GW concentration estimate = 0.5 ug/L at target risk of 1E-6 so MCL of 5 ug/L will result in cancer risk of 1E-5.

Indoor air concentration estimate = 0.2 ug/m3 at target risk of 1E-6 so this would be the new residential IA screening level for VI.

There are questions regarding implementation. HQ has indicated that there will likely need to be training developed to assist risk assessors with some of the implementation due to certain complexities associated with the new tox info.

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----- Forwarded by Meghan Cassidy/R1/USEPA/US on 09/28/2011 03:50 PM -----

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Date:	09/28/2011 02:49 PM
Subject:	Fw: Trichloroethylene (TCE) assessment available from IRIS

A new Summary for Trichloroethylene (TCE) (http://www.epa.gov/iris/subst/0199.htm) and a new accompanying Toxicological Review (http://www.epa.gov/iris/supdocs/0199index.html) have been added to the IRIS website. The Interagency Science Discussion Draft of the Trichloroethylene IRIS assessment (http://cfpub.epa.gov/ncea/iris_drafts/recordisplay.cfm?deid=237625) has also been released.